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Todd McKinnon, Brett Tighe, and  
Frederic Kerrest*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE OKTA, INC. SECURITIES  
LITIGATION

CASE NO. 3:22-cv-02990-SI

**STIPULATION AND ORDER *AS*  
*AMENDED BY THE COURT* REGARDING  
CLASS CERTIFICATION SCHEDULE**

Judge: Hon. Susan Illston  
Courtroom: 1, 17th Floor

1 Plaintiff Nebraska Investment Council (“Plaintiff”) and Defendants Okta, Inc., Todd  
2 McKinnon, Brett Tighe, and Frederic Kerrest (collectively, “Defendants”) hereby stipulate as follows:

3 WHEREAS, on April 28, 2023, the Court held a Case Management Conference and set  
4 deadlines for briefing and a hearing date on Plaintiff’s anticipated motion for class certification (ECF  
5 No. 80);

6 WHEREAS, on August 18, 2023, Plaintiff filed its Motion for Class Certification and  
7 Appointment of Class Representative and Class Counsel (ECF No. 91) (“Class Certification Motion”);

8 WHEREAS, Defendants have served document requests and a Rule 30(b)(6) deposition notice  
9 on Plaintiff and sent document and testimony subpoenas to its two identified investment managers,  
10 Hamilton Lane Advisors and Trinity Ventures XII, L.P., seeking evidence relevant to Defendants’  
11 assessment of Plaintiff’s Class Certification Motion;

12 WHEREAS, since August 30, 2023, the Parties have been engaged in discussions about the  
13 timing of Plaintiff’s production of documents in response to Defendants’ request for documents and  
14 the scheduling of Plaintiff’s deposition in light thereof, as well as other discovery issues related to  
15 Plaintiff’s investment advisor, Hamilton Lane Advisors, and the venture capital fund, Trinity Ventures  
16 XII, L.P.;

17 WHEREAS, Defendants’ current deadline to oppose Plaintiff’s Class Certification Motion is  
18 October 2, 2023 (ECF No. 80);

19 WHEREAS, the Parties have agreed to an extension of the briefing schedule for the Class  
20 Certification Motion to permit Defendants additional time to take discovery from Plaintiff, Hamilton  
21 Lane Advisors and Trinity Ventures XII, L.P.;

22 WHEREAS, this is the Parties’ first request for a deadline extension; and

23 WHEREAS, in the event that additional extensions are necessary to permit Defendants to take  
24 discovery from Plaintiff and its investment managers, the Parties agree to work in good faith to propose  
25 new briefing deadlines;

26 Accordingly, the Parties hereby stipulate, subject to the Court’s approval, that:

27 1. Defendants shall file any opposition to Plaintiff’s Class Certification Motion on or  
28 before November 3, 2023;

2. Plaintiff shall file any response in support of its Class Certification Motion on or before December 18, 2023; and

3. The hearing on the Class Certification Motion shall be rescheduled from December 15, 2023, to a to-be-determined date subject to the Court's availability.

IT IS SO STIPULATED.

Dated: September 22, 2023

**GIBSON, DUNN & CRUTCHER LLP**

By: /s/ Brian M. Lutz  
Brian M. Lutz

*Counsel for Defendants Okta, Inc., Todd McKinnon, Brett Tighe, and Frederic Kerrest*

Dated: September 22, 2023

**LABATON SUCHAROW LLP**

By: /s/ Michael P. Canty  
Michael P. Canty

*Counsel for Lead Plaintiff*

\* \* \*

**ECF ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest that the concurrence in the filing of this document has been obtained from all other signatories.

Dated: September 22, 2023

/s/ Brian M. Lutz  
Brian M. Lutz

**[PROPOSED] ORDER**

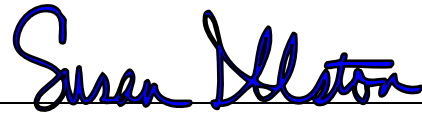
PURSUANT TO STIPULATION, IT IS SO ORDERED ***AS AMENDED BY THE COURT AS FOLLOWS:***

Defendants' Opposition is due: November 3, 2023;

Plaintiff's Reply is due: December 1, 2023;

Motion Hearing on Class Certification shall be held December 21, 2023 at 11:00 a.m. by Zoom webinar.

Dated: September 27, 2023



Hon. Susan Illston  
United States District Judge